



Stakeholder Comments Template

Excess Behind the Meter Production: Straw Proposal

This template has been created for submission of stakeholder comments on the **Excess Behind the Meter Production: Straw Proposal** that was published on **September 11, 2019**. The **Excess Behind the Meter Production**, Stakeholder Meeting presentation, and other information related to this initiative may be found on the initiative webpage at: <http://www.caiso.com/informed/Pages/StakeholderProcesses/ExcessBehindTheMeterProduction.aspx>

Submitted by	Organization	Date Submitted
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Upon completion of this template, please submit it to initiativecomments@caiso.com.

Submissions are requested by close of business on **September 26, 2019**.

Please provide your organization's comments on the following issues and questions.

Gross Load tariff definition clarification

Please state your organization's position on the **reporting of Gross Load tariff definition clarification** as described in the **Excess Behind the Meter Production: Straw Proposal**: (Support, support with caveats or oppose)

If you replied supports with caveats or opposes, please further explain your position and include examples:

The Six Cities do not oppose the proposed definition of the term "Gross Load," subject to the proposed exclusion for certain entities as discussed below.

Excess Behind The Meter Production tariff definition clarification

Please state your organization's position on the **Excess Behind the Meter Production tariff definition clarification** as described in the **Excess Behind the Meter Production: Straw Proposal**: (Support, support with caveats or oppose)

If you replied supports with caveats or opposes, please further explain your position and include examples:

The Six Cities do not oppose the proposed definition of the term "Excess Behind the Meter Production," subject to the proposed exclusion for certain entities as discussed below.

Excess Behind The Meter Production reporting and settlements

Please state your organization's position on the **Excess Behind The Meter Production reporting and settlements** as described in the **Excess Behind the Meter Production: Straw Proposal**: (Support, support with caveats or oppose)

If you replied supports with caveats or opposes, please further explain your position and include examples:

The Six Cities do not oppose the proposed reporting and settlements procedures related to Excess Behind the Meter Production, subject to the proposed exclusion from this process as discussed below.

Additionally, the Six Cities seek clarification regarding the Charge Codes that the CAISO has identified as settling based upon load at Appendix A to the Straw Proposal. Some of the identified Charge Codes are settled based on Measured Demand. (See, e.g., Business Practice Manual for Settlements and Billing Configuration Guide – Real Time Bid Cost Recovery Allocation Charge Code 6678, Ver. 5.4 (03/07/14) at 4.) Stakeholders would benefit from further explanation as to how the Charge Codes listed in the Appendix would be impacted by the revised definitions proposed in the Straw Proposal.

Additional comments

Please offer any other feedback your organization would like to provide on the **Excess Behind the Meter Production: Straw Proposal**.

The Six Cities appreciate the CAISO's recognition of their concerns regarding the potential for limited data availability and the current lack of metering arrangements for behind-the-meter resources that would allow all entities to implement the revised definitions of "Gross Load" and "Excess Behind the Meter Production" at this time. The Six Cities understand the Straw Proposal to propose a grandfathering exemption from the revised definitions (and corresponding reporting and settlements provisions)

for certain entities that have preexisting load calculations determined at a City gate, such as the Six Cities. (See Straw Proposal at 13 n.5, 14-15.)

Preservation of this exemption is critical, as none of the Cities presently requires the metering capability to implement the CAISO's revised definitions and separately report Excess Behind the Meter Production. The Cities are especially concerned that any revised definitions adopted through this initiative not require extensive and/or costly retrofitting of existing meters at all end-use customer locations with rooftop solar, which appears to be the primary behind-the-meter production configuration of principal concern to the CAISO. A grandfathering proposal, such as that proposed by the CAISO, is reasonable and allows the Cities to support the Straw Proposal. The Six Cities look forward to working with the CAISO and stakeholders to craft tariff language to fully reflect this aspect of the CAISO's proposal.